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Attorneys for Defendant  
THE REGENTS OF THE UNIVERSITY  
OF CALIFORNIA

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

ANDREA NAKAGAWA,

Plaintiff,

vs.

THE REGENTS OF THE UNIVERSITY  
OF CALIFORNIA, et al.,

Defendants.

Case No. C06-02066 SI

**STIPULATION AND PROPOSED  
ORDER FOR CONTINUANCE OF  
TRIAL DATE**

Motion for Continuance  
Nakagawa v. UC Regents  
Case No. C06-02066 SI

1 **TO THE HONORABLE COURT:**

2 Pursuant to Local Rule 6-2, Plaintiff ANDREA NAKAGAWA and Defendant  
3 REGENTS OF THE UNIVERSITY OF CALIFORNIA hereby stipulate and respectfully request  
4 that this Court continue the trial date, currently scheduled for October 6, 2008 in the above  
5 entitled action, to December 15, 2008.

6  
7 **STIPULATION AND DECLARATION IN SUPPORT THEREOF TO CONTINUE THE**  
8 **TRIAL DATE**

9  
10 This Stipulation and Request is based on the fact that, on August 29, 2008, at the hearing  
11 on the Motion for Summary Judgment, this Court advanced the trial date originally scheduled for  
12 October 14, 2008 to October 6, 2008. Immediately after the hearing, the parties checked with  
13 their witnesses and Plaintiff learned that one of her key witnesses, Julie Kolar, who was Human  
14 Resources Director at University Relations, is unavailable with plans to be out of state during the  
15 period October 6-17. The plans were specifically made with the former October 14 trial date in  
16 mind. The court also proposed September 29, 2008, as a possible new date for the trial. Plaintiff  
17 is available for that date but Defendant is not available for that date.  
18

19 In light of Plaintiff's need for a continuance, Defendant requests that the trial date be  
20 moved so as to pose the minimum inconvenience to former Vice Chancellor Donald McQuade,  
21 who is no longer Vice Chancellor and now is a Professor of English. Professor McQuade is  
22 teaching two courses this semester two days a week and working on two book contracts. The  
23 semester ends December 9, 2008.  
24

25 Accordingly, the parties request that the trial date be continued to December 15, 2008.  
26

1 The parties further request that the Settlement Conference which has been scheduled with  
2 Magistrate Chen for September 9, 2008, and the Pretrial Conference, which is set for September  
3 30, 2008, remain the same.

4  
5 For the foregoing reasons, the parties by and through their undersigned counsel, declare,  
6 under penalty of perjury, that the foregoing statements are true and correct, and request the Court  
7 to continue the trial date as set forth above.

8 Respectfully submitted,

9  
10 LAW OFFICES OF NEVIN & ABSALOM

11 Dated: September 3, 2008

12 By: \_\_\_\_\_/S/  
13 EDWARD J. NEVIN  
14 Attorney for Plaintiffs

15 GORDON AND REES, LLP

16  
17 Dated: September 3, 2008

18 /S/  
19 By: \_\_\_\_\_  
20 MICHAEL A. LAURENSEN  
21 Attorneys for Defendants

22  
23 **PURSUANT TO STIPULATION, IT IS SO ORDERED,**  
24 Trial to last no more than 6 court days.

25 Dated: September , 2008

26  
27   
28 \_\_\_\_\_  
UNITED STATES DISTRICT JUDGE